

K&L GATES

November 11, 2024

**By ECF**

The Honorable Gregory H. Woods  
United States District Court  
for the Southern District of New York  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

**Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW**

Dear Judge Woods:

On behalf of Defendant Vadim Wolfson, I write to request a modification of Mr. Wolfson's conditions of release to permit him to periodically travel to the Northern District of California for business purposes. Mr. Wolfson currently resides in the Central District of California, and his business obligations require occasional travel to San Francisco.

Pretrial Services consents to this modification provided that Mr. Wolfson gives advance notice of travel and copies of his itinerary. The prosecution team also consents, provided that Mr. Wolfson, in addition to complying with the above request from Pretrial Services, agrees to seek Court approval for any trips that will last longer than five days. Mr. Wolfson agrees to these proposed conditions.

Respectfully submitted,

/s/ David Rybicki  
David Rybicki

*Counsel for Vadim Wolfson*

CC: Counsel of record (by ECF) and Pretrial Services (by email)